

**REMARKS**

Applicant wishes to thank the Examiner for considering the present application. In the Office Action dated January 31, 2005, claims 1-37 stand pending in the application. Applicant respectfully requests the Examiner for reconsideration. Applicant acknowledges that the Examiner has not considered references A, B and C without translations.

The specification has been amended to replace the attorney docket numbers with the appropriate serial numbers.

The drawings stand objected for failing to comply with 37 C.F.R. 1.84(p)(4). The reference numeral "171" has been removed from Fig. 5A. A corrected version of Fig. 5A is provided with the reference numeral 172 therein. The specification has also been amended to refer to Figs. 5A and 5B.

Claims 1-7, 9-14, 16, and 18-37 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Takagi* (6,324,458). Claims 1 and 22 are independent claims and are similar and therefore will be discussed together. Each of the claims includes determining that the vehicle is in a forward or reverse direction and applying brake-steer in response to the forward or reverse direction with different thresholds.

The *Takagi* reference provides a system that changes the turning behavior of the vehicle in response to the drive direction. The Examiner points to Col. 6, lines 1-42, for this premise. Applicant has reviewed this section and cannot find any teaching or suggestion for the application of brake-steer. The *Takagi* reference describes roll control of the vehicle as set forth in Col. 6, line 15 specifically. The portions beginning in Col. 7, lines 35 *et. seq.* also teach roll control for the vehicle. Roll control for the

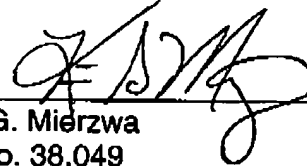
vehicle is different than applying brake steer. When applying brake-steer the turning radius of the vehicle is controlled beyond that provided by the steering wheel input of the vehicle. That is, brake-steer applies the brakes to reduce the turning radius of the vehicle beyond the amount that would be applied to the vehicle otherwise. Applicant has amended claims 1 and 22 to clarify what is meant by brake-steer. Applicant respectfully submits that it is clear that the *Takagi* reference does not teach brake-steer. Applicant therefore respectfully request the Examiner to reconsider the rejection of claims 1 and 22 and the corresponding dependent claims.

Claims 1-4, 8-11, 15-17, 20-22, 28, 30-32, and 34-36 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Mukai* (6,131,693). Applicant has amended claims 1 and 22 as described above. The *Mukai* reference teaches an electric power steering apparatus responsive to the acceleration and deceleration of the vehicle in forward and reverse movements. Applicant can find no teaching or suggestion, however, of brake-steer as set forth in the claims of the present application. Applicant respectfully submits that claims 1 and 22 are allowable since they do not teach brake-steer to reduce a turning radius of the vehicle beyond that corresponding to a steering wheel input by the application of brakes. Applicant therefore respectfully requests the Examiner to reconsider the rejections of claims 1 and 22 and their corresponding dependent claims.

In light of the above remarks, applicants submit that all objections are now overcome. Applicant respectfully submits that the application is now in condition for allowance and expeditious notice thereof is earnestly solicited. Should the Examiner have any questions or comments the Examiner is respectfully requested to call the

undersigned attorney. Please charge any fees required in the filing of this amendment to Deposit Account 06-1510.

Respectfully submitted,



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